

EX PARTE OR LATE FILED



GTE Service Corporation
1850 M Street, N.W., Suite 1200
Washington, DC 20036
202 463-5200

February 24, 1998

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Washington, DC 20554

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FEB 24 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Filing - CC Docket Nos. 96-128 (Pay Telephones)

Dear Ms. Salas:

I am attaching a letter I delivered today to Mary Beth Richards describing the status of GTE's efforts to implement FlexANI to provide payphone coding digits.

Two copies of this notice are filed in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Sincerely,

F. Gordon Maxson
Director - Regulatory Affairs

Attachment: February 24, 1998 letter to Mary Beth Richards

C: Rose Crellin
ITS

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1850 M Street, N.W., Suite 1200
Washington, DC 20036
202 463-5200

February 24, 1998

Ms. Mary Beth Richards
Common Carrier Bureau
Federal Communications Commission
Washington, DC 20554

Dear Ms. Richards:

This letter is further in response to the commitment GTE made to John Muleta in its letter of January 16, 1998 concerning GTE's use of FlexANI to meet the payphone coding digit requirement of the Commission's payphone orders. In that letter, GTE committed to keep Commission staff informed of each step of GTE's FlexANI implementation process. This is GTE's first progress report.

GTE's FlexANI testing process is well underway. It appears, however, that the original 2-3 month estimate for completion will be too short. Since early December we have sought IXC testing. Only during the second week of February was contact finally established with AT&T and MCI. IXC testing (for all D protocol direct connected to an end-office or end-office to tandem Feature Group D "FGD", i.e. non-GTE operator handled calls) arrangements have been finalized with MCI and testing arrangements with AT&T are being negotiated. Assuming the testing goes smoothly, GTE believes it will complete the IXC portion of the FlexANI tests by April 30, 1998.

To date, the testing effort has identified several problem areas. The GTD-5 switch (which serves 52% of the so-called "dumb lines" requiring conversion to FlexANI) is not capable of providing required IXC screening functions (directing FlexANI digits only to those IXCs requesting the service) via SS7 trunk groups. This problem can only be rectified through FlexANI software revisions from the manufacturer (AGCS). AGCS was contacted a month ago and we still have not received a determination as to when (or whether) the problem can be corrected and if so, an estimate of software development time and cost. Problems previously presented to the Commission by SBC, BellSouth, and Bell Atlantic have also been identified in GTE switches from Nortel (28% of the lines requiring conversion) and Lucent (15% of the lines requiring conversion).

Remedies addressing the problems, cost estimates, and time frames for vendor delivery previously communicated by the RBOCs also apply to GTE. Last (and by no means least), it appears the FlexANI product will not work with existing Feature Group C ("FGC") signaling.

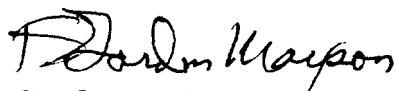
Ms. Mary Beth Richards
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Most operator and coin signaling, between GTE and AT&T, consist of FGC single information digit arrangements within GTE's operating areas. Future tests and interaction will conclusively determine just how much AT&T traffic operates over single information digit trunking, but the possibility exists that all such trunking arrangements would have to be converted to dual information digit trunking arrangements in order for AT&T to receive FlexANI payphone coding digits. This will be a time consuming project and costly undertaking, and will add considerable complexity to GTE's FlexANI implementation process.

As stated in GTE's previous letter, completion of the FlexANI product testing effort remains an obstacle to the development of meaningful product deployment schedules, product cost determinations, and federal tariff cost support information. At this juncture, GTE can still do no more than speculate, as it did in its January letter, that it could be fully converted in as little as eight months (except for non-equal access offices), or conversion could take as long as eighteen months. GTE reaffirms its January pledge that it will keep you fully informed as the results of testing become known and cost and deployment information is determined.

GTE has read USWEST's January 16, 1998 letter to the Commission and believes the FlexANI implementation process described therein accurately depicts the process GTE must complete. GTE, however, must complete the process for five different manufacturer versions of FlexANI, as opposed to three versions described by USWEST. At this point in time (subject to the conclusion of its current product testing effort, subject to vendor delivery of all necessary software patches, and with the exception of current non-equal access offices), GTE anticipates having approximately 99% of its so-called "dumb lines" equipped with FlexANI capability by December 31, 1998. GTE continues to make a good faith effort to comply with the Commission's requirement to provide payphone-specific digits and has shown that good cause exists to extend the existing waiver to at least December 31, 1998. If you have any questions, please call me at (202) 463-5291.

Very truly yours,



F. Gordon Maxson
Director - Regulatory Affairs